

A & A METAL FINISHING COMPANY,LLC
PLANT 2

CONTINGENCY PLAN

AND

EMERGENCY PROCEDURES

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A & A METAL FINISHING COMPANY, LLC

ENVIRONMENTAL POLICY STATEMENT

IT IS THE POLICY OF A & A METAL FINISHING COMPANY, LLC TO BE ONE OF THE TOP METAL FINISHING COMPANIES IN THE UNITED STATES WITH A COMMITMENT TO GO BEYOND COMPLIANCE AND OPERATE ON THE HIGHEST LEVEL OF ENVIRONMENTAL STEWARDSHIP IN THE USE OF CHEMICALS, WATER AND ENERGY RESOURCES.

THE A & A METAL FINISHING COMPANY, LLC IS ONE OF 250 METAL FINISHING COMPANIES WHICH HAS VOLUNTARY SIGNED UP TO BE A CHARTER MEMBER OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S (EPA) NEW STRATEGIC GOALS PROGRAM.

THE STRATEGIC GOALS PROGRAM (SGP) IS A COOPERATIVE EFFORT BETWEEN THE EPA AND THE METAL FINISHING INDUSTRY TO "TEST NEW IDEAS" THAT ARE BOTH BOLD AND "COMMON SENSE" IN NATURE FOR IMPROVED ENVIRONMENTAL PROTECTION.

REVISION OF CONTINGENCY PLAN AND EMERGENCY PROCEDURES

DATE: JANUARY 1999

REVIEWED BY: Howard C. Harclerode, P.E.



SECTION 1. FACILITY IDENTIFICATION AND GENERAL INFORMATION

1. A & A METAL FINISHING COMPANY, LLC, PLANT 2
2. 311 S. HAVEN STREET
BALTIMORE, MARYLAND 21224
3. A & A METAL FINISHING COMPANY, LLC PLANT 2
311 S. HAVEN STREET
BALTIMORE, MARYLAND 21224
410-342-6200
OFFICE HOURS: 7:00A.M. – 4:30P.M.

4. PRIME EMERGENCY COORDINATOR:

1ST. CONTACT PERSON

JOHN NAUMANN III
6531 CORKLEY ROAD
BALTIMORE, MARYLAND 21237 410-866-2111

ALTERNATE EMERGENCY COORDINATOR:

2ND. CONTACT PERSON

ED WEATHERSTEIN JR.
760 208TH STREET
PASADENA, MARYLAND 21222 410-255-7444

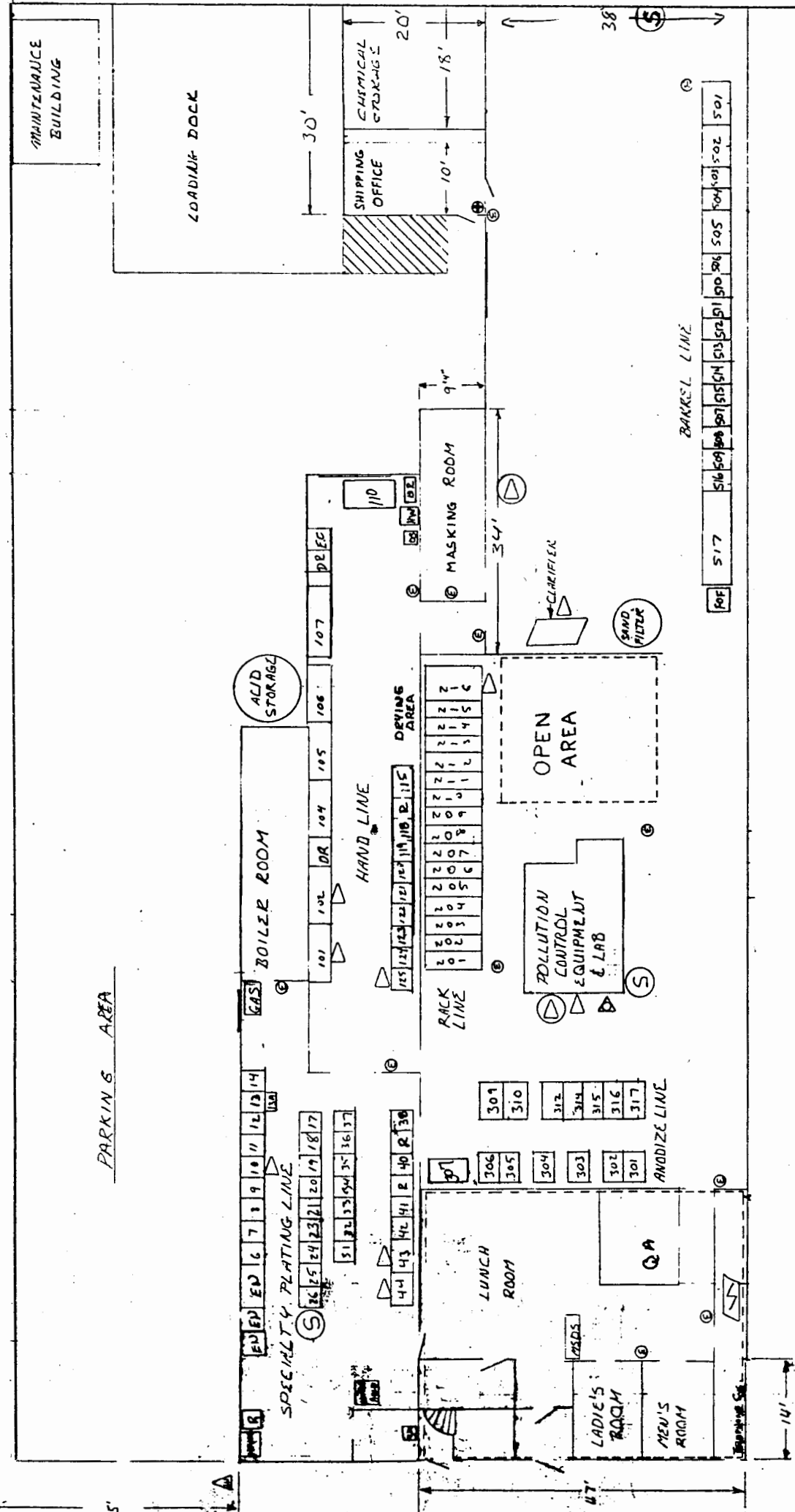
3RD CONTACT PERSON

PHIL HORELICK
8112 ANITA ROAD
BALTIMORE, MARYLAND 21208 410-486-8331

4TH CONTACT PERSON

RUTH ENGLERT
434 EASTERN BLVD 2ND FLOOR
BALTIMORE, MARYLAND 21221 410-391-5141

5. **TYPE OF FACILITY:** A & A METAL FINISHING COMPANY, LLC, PLANT 2 IS A METAL FINISHING JOB SHOP WHICH SERVICES THE MID ATLANTIC AREA. IT OFFERS A COMPLETE RANGE OF PROCESSING IN ALL AREAS OF COMMERCIAL, INDUSTRIAL AND MILITARY METAL FINISHING. THERE IS A GRAVEL PARKING LOT AND THE FACILITY IS SURROUNDED BY A CHAIN LINK FENCE. (SEE ATTACHMENT 1)
6. **FACILITY SITE PLAN:** (PLEASE SEE ATTACHMENT 2)



- NOTES:
- ⚡ - EMERGENCY POWER SHUT-OFF
 - ⚡ - MAIN GAS SHUT-OFF
 - ⚡ - MAIN WATER SHUT-OFF
 - ⚡ - EXTREMELY HAZARDOUS SUBSTANCE, LIQUID
 - ⚡ - EHS - DRY OR LIQUID CONC.
 - ⚡ - FIRE EXTINGUISHERS
 - ⚡ - FIRST AID STATION
 - ⚡ - CYANIDE ANTIDOTE KIT
 - MSDS - MATERIAL SAFETY DATA SHEETS
 - ⚡ - EMERGENCY EYEWASH / SHOWER

7. DESCRIPTION OF TREATMENT, STORAGE AND DISPOSAL ACTIVITIES:

THERE ARE TWO TYPES OF TREATMENT: CONTINUOUS AND BATCH

CONTINUOUS TREATMENT

CONTINUOUS TREATMENT BEGINS AT THE END OF FOUR SEPARATE WASTEWATER STREAMS WHICH ARE GENERATED AT THE PLATING LINES. RINSEWATERS ARE SEGREGATED INTO TWO STREAMS; CYANIDE BEARING AND NON CYANIDE BEARING. THE OTHER TWO WASTE STREAMS ARE ACIDIC AND ALKALINE.

CYANIDE BEARING WASTES:

THE SPECIFIC PROCESSES GENERATING THESE CYANIDE BEARING WASTES ARE: ZINC, CADMIUM, COPPER AND SILVER. THESE RINSEWATERS ARE DRAINED TO ONE TANK FOR CYANIDE DESTRUCTION AT A RATE OF 25-35 GALLONS PER MINUTE. HERE SODIUM HYPOCHLORITE IS USED TO DESTROY THE CYANIDE.

NON CYANIDE BEARING WASTES:

NON CYANIDE BEARING RINSEWATERS ARE PIPED TO THE CHROMIUM REDUCTION TANK, WHERE SODIUM METABISULFITE IS USED TO REDUCE HEXAVALENT CHROMIUM TO TRIVALENT CHROMIUM. THE SPECIFIC PROCESSES GENERATING THESE NON CYANIDE BEARING WASTES ARE: SULFURIC AND CHROMIC ACID ANODIZING, PASSIVATING, CHROMATING, PHOSPHATING, TIN, NICKEL AND ACID GOLD PLATING.

FROM CYANIDE DESTRUCTION AND CHROMIUM REDUCTION, THE TWO RINSEWATER STREAMS MEET AT THE NEUTRALIZATION TANK, FROM HERE, FERRIC CHLORIDE, CALCIUM CHLORIDE, AND POLYMER FLOCCULANTS ARE ADDED TO THE WASTEWATER AND SOLIDS ARE REMOVED THROUGH A CLARIFIER, SAND FILTER, AND FILTER PRESS.

BATCH TREATMENT:

BATCH TREATMENT IS USED FOR ACIDS AND ALKALINE WASTES WHICH ACCUMULATED ON A WEEKLY BASIS IN SEPARATE 1600 GALLON TANKS. THEN ON AN AS NEEDED BASIS, THEY ARE TREATED IN 800 GALLON BATCHES. FIRST, APPROXIMATELY 650 GALLONS OF ACIDIC MATERIAL IS PUMPED INTO THE BATCH TANK, SECOND, 150 GALLON OF ALKALINE MATERIAL IS PUMPED INTO THE BATCH TANK, MIXING IS DONE BY AIR AGITATION, NEXT A SAMPLE IS TAKEN TO THE LAB FOR ANALYSIS. PH AND CHROME CONTENT IS CHECKED – AT THIS POINT SODIUM METABYSULFITE IS ADDED TO REDUCE CHROME AND MIXED FOR 10 MINUTES. ANOTHER SAMPLE IS TAKEN AND THE ADDITION OF CAUSTIC SODA IS ADDED TO BRING THE PH UP TO 10. THE SOLUTION IS MIXED AGAIN AND CHECKED IN THE LAB FOR FINAL APPROVAL OF PH AND CHROME REDUCTION. FLOCCULATION IS ACHIEVED BY THE ADDITION OF A MIXTURE OF FERRIC CHLORIDE AND CALCIUM CHLORIDE BY SIGHT. THE CONTENTS OF THE BATCH SETTLES FOR SEVERAL HOURS AND THEN PUMPED THROUGH THE FILTER PRESS.

STORAGE ACTIVITIES

THERE IS ONE HAZARDOUS WASTE STORAGE AREAS AT THE FACILITY. IT IS A 20 CUBIC YARDS ROLLOFF COVERED BOX. THIS CONTAINER IS LOCATED IN THE PARKING AREA ALONG THE NORTH SIDE OF THE FACILITY.

THE FIRST TYPE OF HAZARDOUS WASTE MATERIAL IS F006 WASTEWATER TREATMENT SLUDGE WHICH IS GENERATED AS DESCRIBED ABOVE THIS MATERIAL IS A DRY GRANULAR MIXTURE OF HEAVY METAL HYDROXIDES AND ONLY EXHIBITS THE TOXICITY CHARACTERISTICS RELATED TO THE METALS IN THE SLUDGE WHICH ARE CHROME, CADMIUM AND ZINC. THERE IS AN ACCUMULATION OF APPROXIMATELY 1 CUBIC YARD PER WEEK.

THE SECOND TYPE OF HAZARDOUS WASTE MATERIALS GENERATED ARE SPENT ACIDS AND CHROMATES WHICH ARE FROM THE PICKLING AND CHROMATING PROCESSES. THESE ARE MIXURES OF HYDROCHLORIC, SULFURIC AND CHROMIC ACIDS ALONG WITH OTHER CHROMIUM COMPOUNDS (DICHROMATES) TOTAL CONCENTRATION APPROXIMATELY –20% GENERATING 2000 GALLONS PER MONTH.

THE THIRD TYPE OF HAZARDOUS WASTE MATERIALS GENERATED ARE SPENT ALKALINES. THEY COME MAINLY FROM THE CLEANING PROCESSES. THE CONCENTRATIONS ARE APPROXIMATELY 5 OUNCES PER GALLON OF CAUSTIC SODA, THEY ARE CORROSIVE AND IN LIQUID FORM. APPROXIMATELY 1000 GALLONS PER MONTH OF THIS WASTE IS GENERATED.

THE FOURTH TYPE OF HAZARDOUS WASTE MATERIAL GENERATED IS SPENT/USED STAY-DRY, USED TO ASSIST IN CLEANING UP SPILLS OF HAZARDOUS MATERIALS CONTAINING METALS AND/OR CYANIDE. THIS DRY GRANULAR MATERIAL ONLY EXHIBITS TOXICITY CHARACTERISTIC RELATED TO THE MATERIALS IT ABSORBS. APPROXIMATELY ONE 55 GALLON DRUM PER MONTH IS GENERATED.

THE FIFTH TYPE OF HAZARDOUS WASTE MATERIAL GENERATED ARE TANK BOTTOM SLUDGES. THIS CAN COME FROM EACH PLATING, CLEANING AND STRIPPING OPERATION. THESE MATERIALS ONLY EXHIBIT THE TOXICITY CHARACTERISTICS RELATED TO THE METALS IN THE BOTTOM SLUDGE.

PLEASE NOTE: A & A METAL FINISHING COMPANY,LLC, PLANT 2 IS ONLY A GENERATOR OF HAZARDOUS WASTE AND IS NOT SUBJECT TO THE REGULATORY REQUIREMENTS FOR HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES UNDER RCRA.

SECTION II EMERGENCY COORDINATOR (S)

1. PRIME EMERGENCY COORDINATOR: **HOME PHONE NUMBERS**

1ST CONTACT PERSON

JOHN NAUMANN III
6531 CORKLEY ROAD
BALTIMORE, MARYLAND 21237
JOB FUNCTION: SUPERINTENDENT

410-866-2111

2. ALTERNATE EMERGENCY COORDINATOR:

2ND CONTACT PERSON

ED WEATHERSTEIN JR.
760 208TH STREET

PASADENA, MARYLAND 21222

410-255-7444

SENIOR PLANT MAINTENANCE:

EMERGENCY RESPONSIBILITIES/ ACTIVITIES:

RESPONSIBLE FOR MECHANICAL MAINTENANCE OF
PLATING TANKS AND EQUIPMENT. MAINTENANCE OF
WATER POLLUTION TREATMENT SYSTEM. FAMILIAR WITH
ALL SUBSTANCES IN USE AND OF ANY HAZARDOUS
WASTE GENERATED.

3RD CONTACT PERSON

PHIL HORELICK
8112 ANITA ROAD
BALTIMORE, MARYLAND 21208

410-486-8331

EMERGENCY RESPONSIBILITIES/ACTIVITIES:

PRESIDENT AND CEO OF CORPORATION
FAMILIAR WITH MOST CHEMICALS IN USE AND
WITH MOST HAZARDOUS WASTE GENERATED.

4TH CONTACT PERSON

RUTH ENGLERT
434 EASTERN BLVD 2ND FLOOR
BALTIMORE, MARYLAND 21221

410-391-5141

JOB FUNCTION: ADMINISTRATIVE ASSISTANT

RESPONSIBLE FOR CALLING 911 IF NECESSARY AND USE

THE COMPANY'S INTERCOM TO START EVACUATION PROCEDURES

IT SHOULD BE NOTED THAT ALL FOUR OF THE ABOVE EMERGENCY
COORDINATORS ARE CAPABLE OF CARRYING OUT THE DETAIL OF EMERGENCY
RESPONSIBILITIES AS THEY ARE SPELLED OUT UNDER EMERGENCY DUTIES AND
AUTHORITY TO COMMIT FACILITY RESOURCES, SECTION II SUB PARAGRAPH 3.

3. EMERGENCY DUTIES AND AUTHORITY TO COMMIT FACILITY RESOURCES

1. **NOTIFY** LOCAL AUTHORITIES: POLICE, FIRE DEPARTMENT, ETC.
2. **IDENTIFY** THE TYPE, SOURCE, AMOUNT AND DEGREE OF RELEASE OF ANY HAZARDOUS MATERIALS DUE TO THE EMERGENCY. THIS INCLUDES MATERIALS WHICH BECOME A WASTE AS A RESULT OF THE INCIDENT. AS BY BEING SPILLED DISCHARGES FROM A RUPTURED TANK, ETC. IF TIME PERMITS TAKE SAMPLES OF THE MATERIALS FOR PURPOSE OF ANALYSIS.
3. **ACCESS** THE POTENTIAL HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT. THE ASSESSMENT MUST INCLUDE DIRECT AND INDIRECT EFFECTS FROM FIRES, EXPLOSIONS AND SPILLS (E.G. TOXIC, IRRITATING AND ASPHYXIATING GASES, SURFACE WATER RUN- OFF, ETC).
4. IF THE EMERGENCY COULD CAUSE A THREAT TO HUMAN HEALTH OR THE ENVIRONMENT OUTSIDE THE FACILITY.
 - A. NOTIFY THE LOCAL AUTHORITIES THAT EVACUATION OF LOCAL AREAS MAY BE NECESSARY.
 - B. NOTIFY THE STATE HAZARDOUS WASTE AGENCY RESPONSIBLE FOR EMERGENCY COORDINATION. IF NOT ABLE TO CONTACT LOCAL COORDINATOR THE NATIONAL RESPONSE CENTER AT 800-424-8802 MUST BE CALLED. GIVE NAME AND ADDRESS OF YOURSELF AND FACILITY, NAME AND QUANTITY OF MATERIALS INVOLVED, AND ANY INJURIES INVOLVED AND POSSIBLE HAZARDS TO HEALTH OR THE ENVIRONMENT.
5. DURING ANY EMERGENCY, TAKE ALL REASONABLE STEPS NECESSARY TO ASSURE THAT ANY OTHER FIRES, EXPLOSIONS, OR RELEASES OF HAZARDOUS SUBSTANCES DO NOT OCCUR OR SPREAD. THESE STEPS MAY INCLUDE: HALTING PRODUCTION, REMOVING OR ISOLATING ALL HAZARDOUS WASTE CONTAINERS, AND CLEANING UP ANY SPILLS.
6. TO MONITOR FOR ALL OTHER POSSIBLE PROBLEMS. (E.G. PRESSURE BUILD-UP, LEAKS, ETC.) CAUSED BY THE EMERGENCY.

7. IMMEDIATELY FOLLOWING ANY EMERGENCY PROVIDE FOR COMPLETE CLEAN UP MEASURES AS NECESSARY, INCLUDING ANY TREATMENT, STORAGE, OR DISPOSAL OF RECOVERED WASTES, CONTAMINATED SOIL, OR WATERS. NO INCOMPATIBLE WASTES MAY BE TREATED; STORED OR DISPOSED OF UNTIL CLEAN UP IS COMPLETED. ALL EMERGENCY EQUIPMENT MUST BE CLEANED UP.
8. REPORTING REQUIREMENTS:
 - A. FOLLOWING CLEAN-UP AND BEFORE RESUMING PRODUCTION THE FOLLOWING MUST BE NOTIFIED: EPA REGIONAL ADMINISTRATORS, APPROPRIATE STATE AND LOCAL AUTHORITIES THAT THE FACILITY IS IN COMPLIANCE WITH PARAGRAPH (7) ABOVE AND READY TO RESUME OPERATIONS.
 - B. WITHIN 15 DAYS THE COMPANY MUST REPORT DETAILS OF THE INCIDENT IN WRITING TO THE EPA REGIONAL ADMINISTRATOR. THE REPORT MUST INCLUDE THE NAME, ADDRESS, AND NUMBER OF THE FACILITY, DATE, TIME AND TYPE OF INCIDENT, INJURIES, ANY ACTUAL OR POTENTIAL HAZARDS TO HEALTH OR ENVIRONMENT RESULTING FROM THE INCIDENT, AND THE ESTIMATED QUANTITY AND DISPOSITION OF ANY MATERIALS RECOVERED AFTER THE INCIDENT.
9. ENSURING THAT ALL PLANT EMPLOYEES ARE INSTRUCTED ANNUALLY AS TO THE PROVISIONS OF THIS PLAN. NEW EMPLOYEES ARE TO BE INSTRUCTED ABOUT THE PLAN AS SOON AS POSSIBLE AFTER EMPLOYMENT.

SECTION III IMPLEMENTATION OF THE CONTINGENCY PLAN

1. PURPOSE

THE PURPOSE OF THIS SECTION IS TO PROVIDE GUIDANCE TO THE EMERGENCY COORDINATOR IN MAKING THE DECISION OF WHEN TO IMPLEMENT THE CONTINGENCY PLAN.

THE CONTINGENCY PLAN AND EMERGENCY PROCEDURES ARE DESIGNED TO ENSURE THAT A & A METAL FINISHING COMPANY, LLC, PLANT 2 IS PREPARED TO ADDRESS ANY EMERGENCY SITUATION RAPIDLY AND IN SUCH A MANNER AND TO PREVENT OR MINIMIZE HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT FROM FIRE OR ANY UNPLANNED SUDDEN RELEASE OF HAZARDOUS MATERIAL CONSTITUENTS TO THE AIR, SOIL, SURFACE WATER, OR GROUND WATER AT THE FACILITY. THE PROVISIONS OF THE CONTINGENCY PLAN ARE CARRIED OUT IMMEDIATELY WHEN EVER THERE IS A FIRE OR RELEASE OF HAZARDOUS MATERIAL WHICH COULD THREATEN HUMAN HEALTH OR THE ENVIRONMENT, AND ACCORDING TO THE PROCEDURES CONTAINED IN THE PLAN WHICH DESCRIBE THE ACTIONS FACILITY PERSONNEL SHALL TAKE IN RESPONSE TO AN EMERGENCY.

2. IMPLEMENTATION CRITERIA

THE FOLLOWING IS THE PLANS IMPLEMENTATION CRITERIA THAT WILL BE USED BY THE EMERGENCY COORDINATOR IN DETERMINING WHEN TO IMPLEMENT THE PLAN.

SPILLS

- THE SPILL COULD RESULT IN RELEASE OF FLAMMABLE LIQUIDS OR VAPORS CREATING A FIRE OR GAS EXPLOSION HAZARD.
- THE SPILL COULD CAUSE THE RELEASE OF TOXIC LIQUIDS OR FUMES.
- THE SPILL CAN BE CONTAINED ON-SITE BUT THE POTENTIAL EXISTS FOR GROUNDWATER POLLUTION DUE TO AQUIFER CONTAMINATION.
- THE SPILL CANNOT BE CONTAINED ON-SITE RESULTING IN OFF-SITE SOIL CONTAMINATION AND/OR GROUND OR SURFACE WATER POLLUTION.

FIRE

- THE FIRE COULD CAUSE THE RELEASE OF TOXIC FUMES.
- IF THE FIRE SPREADS, IT COULD IGNITE MATERIALS AT OTHER LOCATIONS AT THE SITE OR CAUSE HEAT-INDUCED EXPLOSIONS.
- THE FIRE COULD SPREAD TO OFF-SITE AREAS.
- USE OF WATER OR WATER AND CHEMICAL FIRE SUPPRESSANT COULD RESULT IN CONTAMINATED RUN-OFF.

EXPLOSIONS

- AN IMMINENT DANGER EXISTS THAT AN EXPLOSION COULD OCCUR, RESULTING IN A SAFETY HAZARD DUE TO FLYING FRAGMENTS OR SHOCK WAVES.
- AN IMMINENT DANGER EXISTS THAT AN EXPLOSION COULD IGNITE DANGER EXISTS THAT AN EXPLOSION COULD OTHER HAZARDOUS WASTE AT THE FACILITY.
- AN IMMINENT DANGER EXISTS THAT AN EXPLOSION COULD RESULT IN RELEASE OF TOXIC MATERIAL.
- AN EXPLOSION HAS OCCURRED.

SECTION IV. EMERGENCY RESPONSE PROCEDURES

THE FOLLOWING WILL BE THE STEP BY STEP PROCEDURE BY WHICH THE A & A METAL FINISHING COMPANY,LLC, PLANT 2 WILL CONDUCT ITSELF IN THE EVENT OF ANY EMERGENCY, WHICH COULD HAPPEN AT THE FACILITY.

1. **INITIAL ASSESSMENT** – AN INITIAL ASSESSMENT WILL BE UNDERTAKEN FIRST TO DETERMINE WHAT HAZARDOUS MATERIALS AND WASTES MIGHT BE INVOLVED. WHAT ARE THE QUANTITIES, HAZARDS AND WHAT ARE THE POTENTIAL DANGERS WHICH MIGHT BE POSSIBLE.
2. **NOTIFICATION** – STEP TWO WOULD BE THE IMMEDIATE NOTIFICATION OF ALL AFFECTED EMPLOYEES AND OR VISITORS WHO MAY BE PRESENT, AND CALL FOR AN EVACUATION IF NECESSARY.

CALL 911 ADVISE NATURE OF EMERGENCY!!!

PRIME EMERGENCY COORDINATOR:

1ST CONTACT PERSON

JOHN NAUMANN III

6531 CORKLEY ROAD

BALTIMORE, MARYLAND 21237

410-866-2111

ALTERNATE EMERGENCY COORDINATOR:

2ND CONTACT PERSON

ED WEATHERSTEIN JR.

760 208TH STREET

PASADENA, MARYLAND 21222

410-255-7444

3RD CONTACT PERSON

PHIL HORELICK

8112 ANITA ROAD

BALTIMORE, MARYLAND 21208

410-486-8331

4TH CONTACT PERSON

RUTH ENGLERT

434 EASTERN BLVD 2ND FLOOR

BALTIMORE, MARYLAND 21221

410-391-5141

3. CONTROL AND CONTAINMENT

THE THIRD MAJOR STEP IN OUR EMERGENCY RESPONSE PROCEDURES IS THE CONTROL AND CONTAINMENT OF ANY HAZARDOUS MATERIALS OR WASTES WHICH MAY BE RELEASED IN THE EVENT OF AN INCIDENT. IF THE INCIDENT WERE TOO LARGE AND COULD NOT BE DONE SAFELY WITH A & A METAL FINISHING COMPANY, LLC, PLANT 1 PERSONNEL THEN THE PROPER EMERGENCY RESPONSE AUTHORITIES WOULD BE NOTIFIED AS SOON AS POSSIBLE.

THE FOLLOWING IS THE MANOR BY WHICH THE FACILITIES TRAINED PERSONNEL WOULD RESPOND TO ANY OF THE FOUR TYPES OF SMALL SPILLS WHICH COULD OCCUR. THE SPILL CONTROL CART WOULD BE BROUGHT OVER TO THE SITE OF THE SPILL. THE CART CARRIES IN INVENTORY SEPARATE CONTAINERS OF ACID, CAUSTIC SODA, SODIUM METABISULFATE, SODIUM HYPOCHLORITE, A 50-POUND BAG OF STAY-DRY, A BROOM AND SHOVEL.

AN ACID SPILL IS NEUTRALIZED WITH CAUSTIC SODA AND ABSORBED WITH STAY-DRY

AN ALKALINE SPILL IS NEUTRALIZED WITH ACID AND ABSORBED WITH STAY-DRY

ANY CHROME BASED COMPOUND SPILL WOULD BE TREATED WITH SODIUM METABISULFITE UNTIL THE COLOR CHANGES TO A GREEN/BLUE AND ABSORBED WITH STAY-DRY

CYANIDE BASED COMPOUND SPILLS WOULD BE DESTROYED WITH SODIUM HYPOCHLORITE (BLEACH) AND ABSORBED WITH STAY-DRY THEN CHECKED AGAIN FOR ANY CYANIDE LEVELS BEFORE CLEAN UP.

4. CLEAN UP

THE CLEAN UP STEP OF ANY HAZARDOUS MATERIALS RELEASED WOULD BE ACCOMPLISHED BY SHOVELING THE CONTAMINATED STAY-DRY ABSORBENT MATERIAL INTO FIVE GALLON PAILS AND MOVING THE PAILS TO THE HAZARDOUS WASTE STORAGE AREA. THE PERSONAL PROTECTIVE GEAR REQUIRED TO DO THIS TYPE OF TASK WOULD BE: RUBBER BOOTS, GLOVES, APRON AND PROTECTIVE FACE SHIELD OR GOGGLES.

5. DECONTAMINATION

THE DECONTAMINATION OF THE AREA WHERE A RELEASE OCCURRED WOULD BE WITH A FRESH WATER WASH DOWN TO THE 3000 GALLON ACCUMULATING TANK WE USE PRIOR TO TREATMENT.

6. REPLACEMENT OF EQUIPMENT

STEP SIX IS THE REPLACEMENT OF ANY EMERGENCY EQUIPMENT OR MATERIALS WHICH MAY HAVE BEEN USED UP OR DAMAGED AS A RESULT OF AN INCIDENT.

7. NOTIFICATION

STEP SEVEN IS THE NOTIFICATION OF THE EMERGENCY ASSISTANCE AND REGULATORY AUTHORITIES AND THE CRITERIA FOR THE NOTIFICATION:

- A. POLICE DEPARTMENT 410-396-2433
1620 EDISON HIGHWAY
BALTIMORE, MD 21213
ASSISTANTS REQUIRED:
TRAFFIC/CROWD CONTROL IN AND OUT OF OUR
BUILDING ON MONUMENT STREET SECURITY
FIRST AID (IF REQUIRED)
- B. FIRE DEPARTMENT 911
ENGINE COMPANY #51
646 NORTH HIGHLAND AVENUE
BALTIMORE, MD 21205
ASSISTANTS REQUIRED:
TO PUT OUT ANY/ALL FIRES
AID WITH ANY INJURIES AS NECESSARY.
- C. STATE HAZARDOUS WASTE AGENCY 410-631-3400
EMERGENCY RESPONSE 24 HRS 410-974-3551
ASSISTANTS REQUIRED:
EXTRA LIGHTING, PORTABLE TANKS, BODY
EQUIPMENT FOR HIGH TEMP. HEAT AND TO
ASSIST THE FIRE DEPARTMENT IF NEEDED.
INSPECTION OF TRANSPORTATION OF HAZARDOUS
CHEMICALS. ISSUING PERMITS TO HAULERS OF
HAZARDOUS CHEMICALS
- D. HOSPITAL 410-288-2555
CENTRAL MEDICAL CENTER
1101 NORTH POINT BLVD.
BALTIMORE, MD 21205
ASSISSTANTS REQUIRED:
AMBULANCE ALL AND ANY MEDICAL EMERGENCIES.
- E. BALTIMORE CITY PRETREATMENT AGENCY 410-396-9695
POLLUTION CONTROL SECTION (KEN STEWART)
- F. STATE EMERGENCY RESPONSE 24 HRS 410-974-3551
ASSISTANTS REQUIRED:
EXTRA LIGHTING, PORTABLE TANKS, BODY
EQUIPMENT FOR HIGH TEMP. HEAT AND TO
ASSIST THE FIRE DEPT. IF NEEDED. PERMITS
& INSPECTION OF TRANSPORTATION OF HAULERS OF
HAZARDOUS CHEMICALS.

G. CLEAN HARBORS
ASSISTANTS REQUIRED:
TO CONTAIN AND CLEAN UP ANY LARGE
SPILL WHICH COULD NOT BE HANDLED BY
COMPANY PERSONNEL

24 HRS 410-685-3910
800-622-3360

8. TREATMENT

THE TREATMENT AND DISPOSAL OF ANY RELEASED MATERIAL WOULD BE HANDLED AS DESCRIBED IN SECTION I, SUB SECTION 7. UNDER TREATMENT STORAGE AND DISPOSAL ACTIVITIES.

9. PREVENTION

THE PREVENTION OF THE RECURRENCE OF AN INCIDENT WILL BE TAKEN UP AND ANALYZED IN THE EVENT WE HAVE AN INCIDENT. MONTHLY REVIEWS AND CHECKLISTS ARE FOLLOWED AND EQUIPMENT MAINTAINED PROPERLY IN ORDER TO HELP REDUCE ANY TYPE OF INCIDENT.

10. AMENDMENT OF THE PLAN

1. REVISIONS AND AMENDMENTS TO THIS PLAN ARE KEPT AT THE FACILITY AND REGULARLY UPDATED THROUGHOUT THE OPERATING LIFE OF THE FACILITY
2. COPIES OF THIS DOCUMENT ARE PROVIDED TO LOCAL AUTHORITIES AND ORGANIZATIONS LISTED UNDER THE PREPAREDNESS AND PREVENTION PLAN, WHICH MAY BE CALLED UPON TO PROVIDE EMERGENCY SERVICES.
3. THIS PLAN AND ALL REVISIONS TO THE PLAN ARE MADE READILY AVAILABLE TO EMPLOYEES WORKING AT THE FACILITY. EMPLOYEES ARE TRAINED IN THE IMPLEMENTATION OF THE PLAN.
4. THE PLAN IS REVIEWED AND UPDATED, IF NECESSARY, WHEN EVER:
 - A. THE FACILITY LICENSE IS MODIFIED TO ALLOW NEW PROCESS WASTES TO STORE TO TREAT, OR APPLICABLE REGULATIONS ARE REVISED.
 - B. THE LIST OR LOCATION OF EMERGENCY EQUIPMENT CHANGES

- C. THE FACILITY CHANGES IN ITS DESIGN, CONSTRUCTION, OPERATION MAINTENANCE, OR OTHER CIRCUMSTANCES IN A WAY THAT:
 - 1. MATERIALLY INCREASE THE POTENTIAL FOR FIRES EXPLOSIONS, OR RELEASES OF HAZARDOUS WASTE OR HAZARDOUS WASTE CONSTITUENTS, OR;
 - 2. CHANGES IN RESPONSE NECESSARY IN AN EMERGENCY.
- D. THE NAMES, ADDRESSES, OR PHONE NUMBERS OF EMERGENCY COORDINATORS CHANGES.
- E. THE EMPLOYEE ASSIGNED TO EACH EMERGENCY TASK CHANGES OR
- F. THE PLAN FAILS WHEN IMPLEMENTED IN AN EMERGENCY AND BECOMES NECESSARY TO MODIFY.

11. INCOMPATIBLE MATERIALS

CYANIDES AND ACIDS ARE THE TWO MAJOR INCOMPATIBLE MATERIALS WHICH WE CARRY IN INVENTORY AT THE FACILITY. IN AN EFFORT TO AVOID ANY INCIDENTS INVOLVING THE TWO MATERIALS – (ALL ACIDS ARE STORED FAR AWAY FROM THE CYANIDES – AT LEAST 100 FEET) THE CYANIDES ARE STORED IN THE CHEMICAL AREA IN THE WAREHOUSE (UP OFF THE FLOOR). IF THESE TWO MATERIALS MIX HYDROGEN CYANIDE GAS WOULD BE RELEASED.

SECTION V - HAZARDOUS MATERIALS

CHEMICAL LIST

CHEMICAL LIST

COMMON NAME	CHEMICAL NAME	USED FOR
ACETIC ACID, GLACIAL	ACETIC ACID	BRIGHT DIPS
ACID ACTIVATOR #315	PROPRIETARY MIXTURE	
ALUMINUM BLACK BKA POWDER	OF ACID SALTS	PICKLING
	PROPRIETARY	ANODIZE
ALUMINUM BROWN BL	CHROMIUM COMPLEX, OF	
	AZO DYE	ANODIZE
ALUMINUM BROWN BL POWDER	CHROMIUM COMPLEX	
	OF AZO DYE	ANODIZE
ALUMINUM BLUE A POWDER 150	ANTHRAQUINONE DYE	ANODIZE
ALUMINUM BRONZE 2LW	PROPRIETARY	ANODIZE
ALUMINUM FIERY RED		
ML POWDER	PROPRIETARY	ANODIZE
ALUMINUM TURQUOISE PLW.	PROPRIETARY	ANODIZE
ALUMINUM YELLOW 4 A	CHROMIUM COMPLEX OF	
POWDER 133	AZO DYE	ANODIZE
ALUMINUM "DRY"	ALUMINUM SULFATE	WATER TREATMENT
AMBIENOL C	NA. MIXTURE	CLEANING
	CHROMIC ACID	
ALCHROME 2	SODIUM NITRATE	ANODIZE
AMMONIUM CHLORIDE	AMMONIUM CHLORIDE	ZINC PLATING
AMMONIUM NITRATE REAGENT	AMMONIUM NITRATE	LAB
AQUA AMMONIA	AMMONIUM HYDROXIDE	ELECTROLESS NI.
AMMONIUM HYDROGEN FLUORIDE	AMMONIUM BIFLUORIDE	ANODIZING
	MIXTURE OF FLUORIDES	
ANODAL CS-2	COBALT & NI. SALTS	ANODIZING
ANCO-OX 1000	SODIUM SULFITE	WATER TREATMENT
ACETIC ACID,		
AMMONIUM SALT	AMMONIUM ACETATE	ANODIZING
ANTIMONY OXIDE	ANTIMONY TRIOXIDE	LAB
ADDITIVE WT 3140	SODIUM HYPOPHOSPHITE	NICKEL RECOVERY
	MIXTURE OF NICKEL	
	SULFAMATE AND	
ALKALINE E.N. ⁶⁰⁰⁰ 4870 A	AMMONIUM HYDROXIDE	ELECTROLESS NI.
ALKALINE E.N. ⁶⁰⁰⁰ 4870 B	SODIUM HYPOPHOSPHITE	ELECTROLESS NI.
	NICKEL SULFAMATE &	
ALKALINE E.M. ⁶⁰⁰⁰ 4870 ^{6000 D}	AMMONIUM HYDROXIDE	ELECTROLESS NI.
	ALKYL PHENOL	
75230 SURFONIC N-150	ETHOXYLATE	CLEANERS
	BORIC ACID,	
BORIC ACID	ORTHOBORIC	NICKEL PLATING
BARIUM CARBONATE	BARIUM CARBONATE	CHROME PLATING
BARIUM NITRATE C.A.S.		
10022-31-8	BARIUM NITRATE	LAB
ANHYDROUS BORIC ACID	BORIC OXIDE, BORON	NICKEL PLATING
	SODIUM TETRABORATE	
BORAX 10 MOL	DECAHYDRATE	CLEANER

	MIXTURE: SODIUM HYDROXIDE, SODIUM NITRATE, SODIUM THIOSULFATE	BLACK OXIDE
BLACK MAGIC SS-C		
BLACK MAGIC CD	PROPRIETARY	BLACK FOR CADMIUM
	PROPRIETARY	
BLACK MAGIC RT	ACIDIC SOLUTION	LAB
	MIXTURE OF SODIUM HYDROXIDE AND A CHLORITE	
BLACK MAGIC & CB "SPECIAL"		LAB
	PROPRIETARY MIXTURE OF CHROMIC, NITRIC, AND SULFURIC ACIDS	
RODIP ZN-261		ZINC PLATING
BRICHROMATE Z	ACID MIX, CHROMATE	ZINC PLATING
BRI-TIN STARTER	PROPRIETARY MIXTURE	TIN PLATING
BUTYL CELLOSOLVE	2-BUTOXYETHANOL	DEGREASER
	MIXTURE: MOLIBDENIUM ACID SALTS	
FAXBLACK Z-1414		CONVERSION COAT
CADMIUM OXIDE	CADMIUM OXIDE	CADMIUM PLATING
CADMIUM METAL	CADMIUM METAL	CADMIUM PLATING
CAUSTIC POTASH FLAKE	POTASSIUM HYDROXIDE	SILVER PLATING
CAUSTIC SODA BEADS	SODIUM HYDROXIDE	POLLUTION CONTROL
CAUSTIC POTASH, FLAKE	POTASSIUM HYDROXIDE	COPPER PLATING
NIACET CALCIUM ACETATE	CALCIUM ACETATE	ZINC PLATING
	CALCIUM CHLORIDE, DIHYDRATE	
CALCIUM CHLORIDE		WATER POLLUTION TREATMENT
CHROMIC ACID, FLAKE	CHROMIUM TRIOXIDE	BRIGHT DIPS
CALCIUM NITRATE	CALCIUM NITRATE	SILVER PLATING
	MIXTURE: SODIUM HYDROXIDE & CYANIDE	
CLEPO BONDAL		PLATE OVER ALUM.
COPPER CYANIDE	COPPER CYANIDE	COPPER PLATING
	COPPER SULFATE	
COPPER SULFATE	PENTAHYDRATE	COPPER PLATING
CU VER 1 COPPER REAGENT	NOT APPLICABLE	LAB
NUCHAR ACTIVATED CARBONS	CARBON	NICKEL PLATING
DELTA-FLOC 415	POLYMER	WATER TREATMENT
	POTASSIUM DICHROMATE	
DEOXIDIZER 7 MAKE-UP	POTASSIUM NITRATE	ANODIZING
	SODIUM HYDROXIDE	
DUOZINC PURIFIER	HYDROGEN/SULFIDE	ZINC PLATING
EBONOL C	NA	BLACK OXIDE
ECONQ-CAD SUPER L"	NICKEL SULFATE	CADMIUM PLATING
	PROPRIETARY MIXTURE: NITRIC, CHROMIC, & SULFURIC ACIDS	
ECONQ-CHROMATE CL		CONVERSION COAT
ECOALUBE 642	COMPLEX MIXTURE	SPRAY COATING
6000A EL. NICKEL	NICKEL SULFATE	ELECTROLESS NI.
6000B EL. NICKEL	PROPRIETARY MIXTURE	ELECTROLESS NI.

6000C EL. NICKEL	MIXTURE; SODIUM HYPOPHOSPHITE	ELECTROLESS NU.
ELECTROTECH 225	PROPRIETARY MIXTURE	
ELECTROTECH 215	SODIUM HYDROXIDE & SODIUM METASILICATE	CLEANER
ELECTROLYTIC NICKEL	" "	CLEANER
EKOLASID 355 ADJUSTER	NICKEL	NICKEL PLATING
ECOALUBE 642 SOLVENT	NA	NICKEL PLATING
	COMPLEX MIXTURE	DRY FILM LUBE
ENTHOX ZB-992-A	PROPRIETARY MIXTURE SODIUM DICHROMATE AND ACIDS	ZINC PLATING
ENTHOX ZB-992-B	PROPRIETARY MIXTURE SILVER NITRATE AND ACETIC ACID	ZINC PLATING
ENBSTRIP-T	SODIUM HYDROXIDE & SODIUM CHLORITE	TIN PLATING
	MIXTURE OF CAUSTIC SODA & SODIUM METASILICATE	
ENBOND Z - 72		CLEANER
ENTHOBRITE EXTENDER 153	PROPRIETARY MIXTURE	ZINC PLATING
ENTHOBRITE EXTENDER 253	PROPRIETARY MIXTURE	ZINC PLATING
FERRIC AMMONIUM OXALATE	FERRIC AMMON. OXALATE	ANODIZING
FERRIC CHLORIDE SOLUTION	FERRIC CHLORIDE	POLLUTION CONTROL
		ELECTROLESS
FIDELITY #3140 WT ADDITIVE	SODIUM HYPOPHOSPHITE	NICKEL RECOVERY
FIDELEX #3121-B	NA	NI. STRIPPING
FLUOBORIC ACID, 48-50%	FLUOBORIC ACID	TIN PLATING
FOAMASTER K	NA	POLLUTION CONTROL
FUNGICIDE G	METHANOL	GOLD PLATING
MURIATIC ACID 18 DEGREE	HYDROCHLORIC ACID	GENERAL PURPOSE
HYDROGEN PEROXIDE	HYDROGEN PEROXIDE	ZINC PLATING
	HYPOCHLOROUS ACID, SODIUM SALT	
SODIUM HYPOCHLORITE		POLLUTION CONTROL
IRIDITE 5-3	CHROMIC ACID MIXTURE	ZINC PLATING
	CHROMIC, NITRIC, SULFURIC ACID MIXTURE	
IRIDITE 4-73		CONVERSION COAT
IRIDITE 7P	CHROMIC ACID MIXTURE	CONVERSION COAT
	PROPRIETARY MIXTURE CHROMIC ACID, BARIUM NITRATE	
IRIDITE 14-2		ANODIZING
IRIDITE 4L-1	CHROMIC ACID SOLUTION	CAD PLATE
	ALKALINE INORGANIC ORGANIC SALT MIXTURE	
ISOPREP 76		CLEANER
	ALKALINE INORGANIC & ORGANIC SALT MIXTURE	
ISOPREP 35		ETCH - CLEANER
	ORGANIC SURFACTANTS PLUS BUILDERS	
ISOPREP 60		ETCH - CLEANER
	ALKALINE INORGANIC ORGANIC SALT MIXTURE	
ISOPREP 54P		CLEANER
ISOPREP M	PETROLEUM SOLVENT	CLEANING

ISOPREP 188	PROPRIETARY MIXTURE; POTASSIUM DICHROMATE POTASSIUM FLUOBORATE	ALUM. TREATMENT
ISOPREP 177	ALKALINE INORGANIC ORGANIC SALT MIXTURE	CLEANING
KEYKOTE #40	PHOSPHORIC ACID SOLUTION	ZINC PHOSPHATE
KEYKOTE #38	PHOSPHORIC ACID SOLUTION	ZINC PHOSPHATE
LR FUNGICIDE	PROPRIETARY MIXTURE	GOLD PLATING
MAGNIFLOC 835A	MANIFLOC 835A FLOCCURANT	WATER TREATMENT
FORMIC ACID	METHANOIC ACID	CONVERSION COAT
METHYL ETHYL KETON	2-BUTANONE	LAB
METHANOL	METHANOL	DEGREASING
MICROSTRIP "A"	PROPRIETARY MIXTURE ORGANIC SOLVENT	MASKING
MICROMACK REDUCER	MIXTURE OF SOLVENTS	MASKING
METHACRYLIC ACID GLACIAL	METHACRYLIC ACID GLA.	LABORATORY
MONOETHANOLAMINE	MONOETHANOLAMINE	CLEANERS
MONOSODIUM MSP.	MONOSODIUM PHOSPHATE	CLEANERS
MORWET DB POWDER	ANIONIC SURFACTANT	CLEANER
M&T. NICKEL ADDITIVE 4-17	NA	BRIGHT NICKEL
ACID AMMONIUM PROPURATE	MUREXIDE	LAB
M&T. LEAD ANODES	LEAD	CHROME PLATING
NICKEL ACETATE	NICKEL ACETATE	ANODIZING
NI. CHLORIDE HEXAHYDRATE	NICKEL CHLORIDE	NICKEL PLATING
NICKEL CHLORIDE CRYSTALS	NICKEL CHLORIDE	NICKEL PLATING
NICKEL CARBONATE	NICKELOUS CARBONATE	NICKEL PLATING
NITRIC ACID	NITRIC ACID	PICKLE/STRIPPING
NTA POWDER OR	CLYCINE, N,N-B'S' CARBOXY METHYL'-, TRISODIUM SALT	LAB
NTA 40% SOLUTION		
NICKEL SULFATE, HEXAHYDRATE	NICKEL SULFATE CONCENTRATE	NICKEL PLATING
NICKEL SULFATE HEXAHYDRATE	NICKEL SULFATE CRYSTAL	NICKEL PLATING
OAKITE 360L	ALKALINE INORGANIC MIXTURE	CLEANER
RUST PEL SOLUBLE "D"	NAPHTHENIC OIL	PHOSPHATE COAT
OROBENE 999	COBALT AND NICKEL COMPLEXES	GOLD PLATING
BRIGHTENER		
OROBENE 999	PROPRIETARY MIXTURE	
MAKE AP #1	CITRIC ACID & CITRATES	GOLD PLATING
OAKITE 131	NA. MIXTURE	CLEANER
OAKITE	PROPRIETARY MIXTURE	
DEOXIDIZER 55	HYDROGEN FLUORIDE, NITRIC ACID	DEOXIDIZER
	PROPRIETARY MIXTURE	
3CO LUBRITE 2	ACID & MANGANESE COMPOUNDS	MANG. PHOSPHATE
	PROPRIETARY MIXTURE	BLACK
PAXBLACK 1414	MILYBDENUM COMP.	CONVERSION COAT
PAXWAX 573 B	PROPRIETARY PRODUCT	WAX COATING

PEN DIP 300	MIXTURE OF MINERAL	PHOSPHATE
624 SOLVENT	SPRITS AND OIL	CLEANING
	PETROLEUM HYDROCARBON	
NUTO H 46	PETROLEUM LUBRICATING	PHOSPHATE
PHOSPHORIC ACID 75,80,85%	OIL	PHOSPHATE
PLURONIC F68	PHOSPHORIC ACID	CLEANERS
PRAESTOL 2530	POLYGLYCOL	MAINTENANCE
CARBONATE OF POTASH	POLYMER	COPPER PLATING
RED PRUSSIAN OF POTASH	POTASSIUM CARBONATE	CONVERSION COAT
POTASSIUM IODATE SOL.	POTASSIUM FERRICYANIDE	LAB ANALYSIS
MURIATE OF POTASH	POTASSIUM IODATE	LAB ANALYSIS
	POTASSIUM CHLORIDE	PURIFICATION OF
POTASSIUM PERMANGANATE	POTASSIUM	PLATING SOLUTION
	PERMANGANATE	ZINC, CAD, COP,
POTASSIUM CYANIDE	POTASSIUM CYANIDE	& SILVER PLATE
ROCHELLE SALT	POTASSIUM SODIUM	COPPER PLATING
	TARTRATE	
POTASSIUM BORATE	POTASSIUM PENTABORATE,	CHEMICAL BLEND
SODIUM BISULFITE	OCTAHYDRATE	
ANHYDROUS	PYROSULFUROUS ACID	WATER TREATMENT
POTASSIUM DICHROMATE	POTASSIUM DICHROMATE	CONVERSION COAT
Q-LEVEL	PROPRIETARY MIXTURE:	
BRIGHTENER	AKALINES & CYANIDES	COPPER PLATING
	PROPRIETARY MIXTURE:	
Q-TRAL	AMINES AND SALTS	COPPER PLATING
REFLECTA CONVERTER	SACCHARINE	NICKEL PLATING
REFLECTA MAINTENANCE	SACCHARINE	NICKEL PLATING
01541 ROCK DRILL LUBE 46	ROCK DRILL OIL	ORGANIC COATING
RODIP ZN-BLU	MIXTURE OF SODIUM	CONVERSION COAT
SAT-TIN P-17	FLUORIDE & DICHROMATES	FOR ZINC
SAT-TIN OS	AROMATIC SURFACTANTS	TIN PLATING
SILVER ANODES	ALCOHOL SOLUTION	TIN PLATING
SILVER OXIDE	SILVER	SILVER PLATING
SILVER CYANIDE	SILVER OXIDE	CHROME PLATING
HYFLO SUPER-CEL	SILVER CYANIDE	SILVER PLATING
	SILICA	NICKEL PLATING
SODIUM ACETATE CRYSTAL	SODIUM ACETATE	
SODIUM BICARBONATE	TRIHYDRATE	CONVERSION COAT
	SODIUM HYDROCARBONATE	COPPER PLATING
SODIUM BICHROMATE CRYSTAL	DICHROMIC ACID,	
	DISODIUM SALT	ANODIZING
SODIUM BISULFATE	SODIUM HYDROGEN	
SODIUM SOLICOFUORIDE	SULFATE	DEOXIDIZER
SODIUM FLUOBORATE	SODIUM SOLICOFUORIDE	CLEANERS
SODIUM GLUCONATE	SODIUM FLUOBORATE	DEOXIDIZER
SODIUM CARBONATE,	SODIUM GLUCONATE	CLEANERS
MONOHYDRATE		
A ASH	SODIUM CARBONATE	COPPER PLATING
WATERLING SALT	SODIUM CARBONATE	COPPER PLATING
SODIUM HYPOCHLORITE	SODIUM CHLORIDE	POLLUTION CONTR
CEMCO 6010	SODIUM HYPOCHLORITE	CYANIDE DESTROY
	SODIUM HYPOCHLORITE	ELECTROLESS NU.

CAUSTIC SODA BEADS	SODIUM HYDROXIDE ANHYDROUS	WATER TREATMENT
LIQUID CAUSTIC SODA 73, 50%	SODIUM HYDROXIDE SOLUTION	ZINC, COPPER, SILVER PLATING
SODIUM DITHIONITE	SODIUM HYDROSULFITE	METAL RECOVERY
UNIFLO 26	SODIUM METACOLICATE PENTAHYDRATE	CLEANERS
SODIUM METABISULFITE	SODIUM METABISULFITE	CHROME REDUCTIO
SODIUM NITRATE	SODIUM NITRATE	CLEANERS
SODIUM THIOSULFATE	SODIUM THIOSULFATE ANHYDROUS	LAB ANALYSIS
SODIUM SILICATE	SILICIC ACID, DISODIUM SALT	CLEANING MIXTURE
LIQUID SODIUM ZINC CYANIDE	SODIUM ZINC CYANIDE	ZINC PLATING
COPPER CYANIDE DOUBLE SALT	SODIUM COPPER CYANIDE	COPPER PLATING
SYNESSTIC 68	SYNTHETIC LUBRICANT	EQUIPMENT MAINT
SOLDERON STRIP 731	PROPRIETARY	TIN PLATING
SODIUM STANNATE	SODIUM STANNATE, TRIHYDRATE	TIN PLATING
SODIUM SULFATE, ANHYDROUS	SODIUM SULFATE	CLEANERS
STANNOUS SULFATE	STANNOUS SULFATE	TIN PLATING
SOLDERON ACID	PROPRIETARY MIXTURE OF ORGANIC ACIDS	TIN LEAD PLATE
SOLDER ON BR, REPLENISHER	AQUEOUS ORGANIC MIXTURE	TIN LEAD PLATE
SOLDER ON LEAD CONC.	LEAD SALT OF ORGANIC ACID	TIN LEAD PLATE
SOLDER ON TIN CONCENTRATE	TIN SALT-ORGANIC ACID	TIN LEAD PLATE
SOLDER STRIP 81	ACIDIC SOLUTION OF ORGANIC & INORGANIC COMPOUNDS	TIN STRIPPING
SOLDER ANTIFOAM	AQUEOUS SOLUTION OF SURFACE ACTIVE AGENT	TIN PLATING
SOL-U-DRY L OIL	NAPHTHENIC OIL	PHOSPHATE
SULFURIC ACID	SULFURIC ACID	WATER TREATMENT PICKLING
SYNASOL SOLVENT	DENATURED ETHANOL	CLEANING
SUPER XL LIQUID	NICKEL SULFATE	CADMIUM PLATING
SUPER STRIP 100	ORGANIC ACID SALTS	GOLD STRIPPING
SODIUM SULFITE	SODIUM SULFITE 94%	SILVER RECOVERY
STRIP-B CP-TRU	ORGANIC COMPOUNDS	NICKEL STRIP
STRIP-C CP-TRU	ETHYLENE DIAMINE	NICKEL STRIP
STRIP-L-CP-FAST, FS2	DIETHYLENE TRIAMINE	NICKEL STRIP
TECHNI-SILVER "E"	POTASSIUM ANTIMONYL TARTRATE	SILVER PLATING
MAKE UP B		
THIOCARBAMIDE	THIOUREA	REDUCER
TRIETHANOLAMINE 85%	TRIETHANOLAMINE	CLEANERS
TRITON CF-76 SURFACTANT	ORGANIC COMPOUNDS	CLEANERS
TRITON QS-44 SURFACTANT	OCTYLPHENDXY POLY ETHOXY ETHYLPHOSPHATE	CLEANERS
TON R" QS-15 SURFACTANT	ORGANIC COMPOUNDS	CLEANERS
ST PURIFIER SPECIAL	METAL CYANIDE	COPPER PLATING
TECHNI TIN MAKE UP 89T	SURFACTANT BLEND	TIN PLATING
TECHNI TIN REPLENISHER 89	PROPRIETARY MIXTURE	TIN PLATING

UNICHROME CR-110 8RMS	CHROMIC ACID MIXTURE	CHROME PLATING
UNICHROME CR-204 5RHS COMPOUNDS	CHROMIC ACID POTASSIUM SILICOFLUORIDE	CHROME PLATING
UDYLITE CRYSTAL 012320	PROPRIETARY MIXTURE	EQUIP. MAINTEN.
UNIFLO 26	SODIUM METASILICATE PENTAHYDRATE	WATER TREATMENT
ZINC PURIFIER	METAL SULFIDE	ZINC PLATING
8HQ ZINC	ZINC	ZINC PLATING
ZINC CYANIDE	ZINC CYANIDE	ZINC PLATING
ZINC CHLORIDE SOLID	ZINC CHLORIDE	ZINC PLATING
ZINC OXIDE	ZINC OXIDE	ZINC PHOSPHATE
FLOOR ABSORBANT	ORGANICS	HOUSE KEEPING
ZINC PLATING ADDITION AGENT 147	MIXTURE OF ORGANICS	ZINC PLATING
ZINC PURIFIER	PROPRIETARY SODIUM HYDROXIDE AND SULFIDE MIXTURE	ZINC PLATING

SECTION VI - TRAINING

TYPES OF TRAINING:

THERE ARE TWO TYPES OF TRAINING WHICH ARE CONDUCTED AT A & A METAL FINISHING COMPANY, LLC, PLANT 1. THE FIRST TYPE OF TRAINING IS KNOWN AND PRESCRIBED BY THE OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200) MORE COMMONLY KNOWN AS THE RIGHT-TO-KNOW LAW.

ALL EMPLOYEES OF RECORD (EVEN OFFICE PERSONNEL) ARE REQUIRED TO TAKE THIS TRAINING. THE TRAINING TAKES THE FORM OF A VIDEO THAT COVERS: 1. EMPLOYEES RIGHTS UNDER THE LAW. 2. HOW TO INTERPRET CONTAINER LABELING. 3. PROPER USE OF SAFETY EQUIPMENT. 4. HOW TO READ MATERIAL SAFETY DATA SHEETS. 5. COMMON MATERIALS AND METHODS IN METAL FINISHING.

AFTER THE VIDEO, EACH EMPLOYEE READS A COPY OF THE A & A METAL FINISHING COMPANY, LLC PLANT 1 CONTINGENCY PLAN. AT THAT TIME QUESTIONS ARE ASKED AND ANSWERED.

AT THE END OF THE TRAINING SESSION A TRAINING CERTIFICATE IS SIGNED BY THE EMPLOYEE AND HIS OR HER INSTRUCTOR. A COPY IS PUT INTO THEIR PERSONAL FILE.

ONCE A YEAR, USUALLY IN THE LAST TWO WEEKS OF DECEMBER, AN ANNUAL REVIEW IS HELD IN THE EMPLOYEE LUNCHROOM. AN OSHA RIGHT-TO-KNOW PERSONNEL TRAINING RECORD IS KEPT FOR EACH EMPLOYEE, WHICH INCLUDES HIS OR HER NAME, JOB TITLE AND JOB DESCRIPTION.

THE SECOND TYPE OF TRAINING WHICH IS CONDUCTED AT A & A METAL FINISHING COMPANY, LLC PLANT 1. HAS TO DO WITH THE HANDLING OF HAZARDOUS WASTE AND MATERIALS.

HAZARDOUS WASTE REGULATION (40 CFR 265.16) REQUIRE THAT PLANT PERSONNEL WHOSE DUTIES INCLUDE SUPERVISING, HANDLING, CONTINGENCY PLAN IMPLEMENTATION OR OTHER HAZARDOUS WASTE ACTIVITIES RECEIVE TRAINING IN HAZARDOUS WASTE PROCEDURES AND REGULATIONS. THE TRAINING REQUIREMENTS EMPHASIZE FAMILIARIZATION WITH ON-SITE EMERGENCY PROCEDURES. AFTER INITIAL TRAINING ALL AFFECTED EMPLOYEES MUST RECEIVE AN ANNUAL UPDATING OF THEIR TRAINING.

THE TRAINING TAKES THE FORM OF THREE (3) VIDEOS:

1. CHEMICAL SAFETY 19.5 min
2. SAFE CHEMICAL HANDLING – PART 1 20.54 min
3. SAFE CHEMICAL HANDLING – PART 11 19.18 min

ADDITIONAL TRAINING IS DONE BY OUR CHIEF CHEMIST, ABE VIZHANSKY.

TOPICS INCLUDE:

1. HANDLING HAZARDOUS WASTE AND MATERIALS, WHICH ARE GENERATED AT THE FACULTY.
2. MATERIALS AND METHODS – MAJOR CHEMICALS GROUPS ARE DISCUSSED.
3. CONTINGENCY PLAN FAMILIARIZATION AS THEY RELATE TO HAZARDOUS WASTE.
4. HAZARDOUS WASTE TOPICS FROM OUR 34 PAGE TRAINING GUIDELINE BOOK SEE SECTIONS.

A HAZARDOUS WASTE PERSONNEL TRAINING RECORD IS KEPT ON FILE UP STAIRS IN THE TRAINING ROOM ON EMPLOYEES WHO TAKE THIS TRAINING IT INCLUDES NAME, JOB TITLE, AND JOB DESCRIPTIONS.

SECTION VII EMERGENCY EQUIPMENT

THE FOLLOWING IS A LIST OF THE EMERGENCY EQUIPMENT LOCATED AT THE FACILITY. A DESCRIPTION AND CAPABILITIES OF THE EQUIPMENT IS ALSO INCLUDED. THE EXACT LOCATIONS OF THE EMERGENCY EQUIPMENT IS PROVIDED IN THE FACILITY DIAGRAM IN THIS SECTION.

1. ENTRANCES – THE ENTRANCES INTO THE FACILITY ARE METAL DOORS, WITH THE EXCEPTION OF THE FRONT DOOR WHICH IS GLASS. THESE DOORS ARE 36 INCHES WIDE AND 80 INCHES HIGH. THE ENTRANCES ON THE SIGHT PLAN ARE MARKED AS EXITS.
2. EMERGENCY EXITS - ANY EXIT IN THE FACILITY CAN BE USED IN AN EMERGENCY IN CASE OF A FIRE.
3. SPILL CONTROL EQUIPMENT - STAY-DRY ABSORBING MATERIAL IS CAPABLE OF CONTAINING AND CLEANING UP SMALL CHEMICAL SPILLS.
4. COMMUNICATION SYSTEMS / PHONES / SPEAKERS – A NETWORK OF SPEAKERS ARE LOCATED THROUGHOUT THE FACILITY – THE PHONE SYSTEM IS CAPABLE OF CALLING OUT TO 911 IN CASE OF AN EMERGENCY AND ALERTING ANYONE IN THE FACILITY THOUGH THE INTERNAL SPEAKER INTERCOM.
5. FIRE ALARM SYSTEM – THERE IS A FIRE ALARM SYSTEM WHICH IS WIRED DIRECTLY TO A MONITORING STATION (AUSTRONICS SECURITY) WHICH CALLS THE FIRE DEPARTMENT. THIS SYSTEM STAYS ACTIVATED 24 HOURS A DAY, 7 DAYS PER WEEK. WHEN ACTIVATED A VERY LOUD BELL CAN BE HEARD THROUGHOUT THE SHOP.
6. DECONTAMINATION EQUIPMENT – THERE ARE SEVEN WATER HOSES LOCATED THROUGHOUT THE FACILITY WHICH ARE USED TO WASH DOWN ANY CONTAMINATED AREA AND A HIGH PRESSURE STEAM CLEANER IS ALSO IN INVENTORY.
7. FIRST AID STATIONS - THERE IS ONE FIRST AID STATION AT THE FACILITY. IT IS WHITE PLASTIC CABINET WHICH MEASURES 24" LONG BY 15" WIDE BY 9" THICK AND IN BOLD LETTERS ACROSS THE FRONT READS **FIRST AID**. THE KIT IS CUSTOM CREATED TO TREAT SMALL CUTS AND MINOR CHEMICAL BURNS.

8. EMERGENCY EQUIPMENT LOCATION – THE EMERGENCY EQUIPMENT LOCATIONS AS THEY RELATE TO SECTION V ARE NOTED ON THE FACILITY DIAGRAM AT THE END OF THIS SECTION.
9. EYE WASH STATIONS – THERE ARE THREE EYE WASH STATIONS AND TWO SAFETY SHOWERS LOCATED AT THE FACILITY. THIS EQUIPMENT IS CAPABLE OF FLUSHING THE EYES (EYE WASH) AND ENTIRE BODY (SHOWER) IF ANY CONTAMINATION WITH A HAZARDOUS MATERIAL OCCURS.
10. FIRE EXTINGUISHERS – THERE ARE 13 FIRE EXTINGUISHERS LOCATED THROUGHOUT THE FACILITY – SEE DIAGRAM FOR EXACT LOCATIONS.
11. EMERGENCY RESPIRATORS - THERE ARE EMERGENCY RESPIRATORS LOCATED IN THE POLLUTION CENTER LAB.
12. MONITORING EQUIPMENT – A HIGH LEVEL WATER ALARM SYSTEM IS INSTALLED AND CAPABLE OF SELF MONITORING THE FACILITY FOR A HIGH LEVEL WATER FLOW. IN A HIGH LEVEL SITUATION AN ALARM WILL SOUND.
13. HAZARDOUS MATERIAL STORAGE AREA – THERE IS A HAZARDOUS WASTE STORAGE AREAS AT THE FACILITY AS MENTIONED IN SECTION I. TOP AND BOTTOM PARAGRAPHS. THE HAZARDOUS WASTE STORAGE AREA IS ALSO NOTED IN THE FACILITY DIAGRAM UNDER THIS SECTION TITLED EMERGENCY EQUIPMENT.

AN EXAMPLE OF THE TYPE OF LABEL REQUIRED FOR THIS TYPE OF MATERIAL IS SHOWN BELOW:

HMIS®

HEALTH	<input type="text"/>
FLAMMABILITY	<input type="text"/>
REACTIVITY	
PERSONAL PROTECTION	<input type="text"/>

14. HAZARDOUS WASTE STORAGE AREA (CHEMICAL STORAGE) – THE COMPANY HAS A CHEMICAL STORAGE AREA LOCATED TOWARD THE REAR OF THE FACILITY. THE STEEL SHELVES (FOUR LEVELS HIGH) HOLD FIBER, STEEL AND PLASTIC DRUMS OF VARIOUS SIZES. ALL THE DRUMS ARE LABELED.

AN EXAMPLE OF THE TYPE OF LABELS REQUIRED FOR THIS TYPE OF MATERIAL IS SHOWN BELOW:

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA /MANIFEST
ID NO. /DOCUMENT NO. _____ / _____

ACCUMULATION
START DATE _____ EPA
WASTE NO. _____

[_____]
[_____]
[_____]
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM6

15. PERSONAL PROTECTION EQUIPMENT – THE TYPES OF PERSONAL PROTECTION EQUIPMENT USED AT THE FACILITY INCLUDES: RUBBER GLOVES, GOGGLES, APRONS, BOOTS AND RESPIRATORS. THE ABOVE EQUIPMENT IS THE RESPONSIBILITY OF EACH EMPLOYEE TO TAKE CARE OF. THE EMPLOYEES ARE ENCOURAGE TO CLEAN AND LOCK THEIR EQUIPMENT UP WHEN NOT IN USE. THE CAPABILITIES OF THE ABOVE MENTIONED EQUIPMENT IS TO PROTECT THE INDIVIDUAL FROM ALL POSSIBLE HARM FROM THE HAZARDOUS MATERIALS THEY WORK AROUND ON A DAILY BASIS.

EMERGENCY EQUIPMENT PLAN LAY OUT

LEGEND:

1. ENTRANCES
2. EMERGENCY EXITS
3. SPILL CONTROL EQUIPMENT
4. COMMUNICATION SYSTEMS/SPEAKERS
5. FIRE ALARM SYSTEMS/SIRENS/BELLS
6. DECONTAMINATION EQUIPMENT
7. FIRST AID STATIONS
8. EMERGENCY EQUIPMENT LOCATIONS
9. EYE WASH STATIONS
10. FIRE EXTINGUISHERS
11. EMERGENCY RESPIRATORS
12. MONITORING EQUIPMENT
13. HAZARDOUS MATERIAL STORAGE AREA
14. HAZARDOUS WASTE STORAGE AREA
15. PERSONAL PROTECTION EQUIPMENT

SEE FOLD OUT OF THE EMERGENCY EQUIPMENT PLAN – ALL ITEMS MENTIONED IN THIS LEGEND ARE SYMBOLIZED AND PLACED IN THERE EXACT LOCATION.

SECTION VIII COORDINATION AGREEMENTS

THE COORDINATION AGREEMENT SECTION DESCRIBES THE ARRANGEMENTS AGREED TO BY THE FEDERAL, STATE AND LOCAL EMERGENCY CONTACTS LISTED.

THE FOLLOWING LETTER WILL BE SENT TO ALL OF THE EMERGENCY CONTACTS ON THIS LIST.

SUBJECT: HAZARDOUS WASTE
CONTINGENCY PLAN & EMERGENCY PROCEDURES

ATTACHED IS A COPY OF OUR CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR A & A METAL FINISHING COMPANY, 4004 EAST MONUMENT STREET, BALTIMORE MARYLAND 21205. THIS DOCUMENT WAS PREPARED IN ACCORDANCE WITH APPLICABLE HAZARDOUS WASTE REGULATIONS. THESE REGULATIONS REQUIRED HAZARDOUS WASTE GENERATION, TREATMENT, STORAGE AND DISPOSAL FACILITIES TO DESCRIBE ARRANGEMENTS AGREED TO BY LOCAL POLICE DEPARTMENTS, FIRE DEPARTMENTS, HOSPITALS, CONTRACTORS, STATE AND LOCAL EMERGENCY RESPONSE TEAMS TO COORDINATE EMERGENCY SERVICES DURING AN EMERGENCY INVOLVING HAZARDOUS MATERIALS OR WASTES.

THE CONTINGENCY PLAN DETAILS THE LAYOUT OF THE PLAN, BUILDING EVACUATION ROUTES FOR PERSONNEL, AND THE PROCEDURES FOR RESPONDING TO AN EMERGENCY. PLEASE REVIEW AND REPLY WITH YOUR COMMENTS SO THAT WE CAN DOCUMENT OUR ARRANGEMENT AND COMPLY WITH THE REGULATIONS.

SINCERELY,
A & A METAL FINISHING COMPANY, LLC
PLANT 2

PHILIP D. HORELICK
PRESIDENT

1. POLICE DEPARTMENT
1620 EDISON HIGHWAY
BALTIMORE, MARYLAND 21213

410-396-2433

ASSISTANCE REQUIRED:
TRAFFIC / CROWD CONTROL IN AND OUT OF
BUILDING AND ON MONUMENT STREET.
SECURITY AND FIRST AID IF REQUIRED.

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED PLANT LAYOUT AUTOMATICALLY
ALERTED WHEN SECURITY SYSTEM IS
BREACHED. DETAILED SECURITY LAYOUT

2. BALTIMORE CITY FIRE DEPARTMENT
FIRE PREVENTION BUREAU
ATTN: CAPTAIN CLINTON GEORGE
414 N. CALVERT STREET
BALTIMORE, MARYLAND 21202

911

410-396-5597

ASSISTANCE REQUIRED:
TO PUT OUT ANY / ALL FIRES.
AID WITH ANY INJURIES AS NECESSARY.

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED PLANT LAYOUT
INCLUDING ALL HAZARDOUS MATERIALS
(LOCATED IN FRONT OF BUILDING IN RED BOX)

3. CLINIC
CONCENTRA ROSEDALE
8206 PULASKI HIGHWAY
BALTIMORE, MARYLAND 21237

410-687-6462

ASSISTANCE REQUIRED:
AMBULANCE
ALL AND ANY MEDICAL EMERGENCIES.

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED LAYOUT
MATERIAL SAFETY DATA SHEETS
OF ALL HAZARDOUS MATERIALS/ CHEMICALS
ON SITE ACCIDENT REPORTS

- 4 EMERGENCY RESPONSE
STATE HAZARDOUS WASTE AGENCY
2500 BRONING HIGHWAY
BALTIMORE, MARYLAND 21224

410-974-3551
410-631-3400

ASSISTANCE REQUIRED:
TO DOCUMENT NOTIFICATION OF EMERGENCY

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED LAYOUT
INCLUDING HAZARDOUS CHEMICALS

5. EMERGENCY RESPONSE

(24 HRS) 410-974-3551

ASSISTANCE REQUIRED:
EXTRA LIGHTING, PORTABLE TANKS,
BODY EQUIPMENT FOR HIGH TEMP.
HEAT AND TO ASSIST THE FIRE DEPARTMENT
IF NEEDED.

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED LAYOUT
INCLUDING ALL HAZARDOUS CHEMICALS

6. CLEAN HARBORS

(24HRS) 410-685-3910
800-622-3360

ASSISTANCE REQUIRED:
TO CONTAIN AND CLEAN UP ANY LARGE
SPILL WHICH COULD NOT BE HANDLED BY
COMPANY PERSONNEL

INFORMATION AVAILABLE:
CONTINGENCY PLAN
DETAILED LAYOUT
INCLUDING ALL HAZARDOUS CHEMICALS

SECTION IX EVACUATION PLAN

A. WHEN TO EVACUATE

EVACUATION WOULD BEGIN WHEN THERE IS AN IMMINENT OR ACTUAL EMERGENCY SITUATION SUCH AS, A FIRE OR MAJOR SPILL OF A HAZARDOUS MATERIAL.

B. SIGNALS TO BEGIN EVACUATION

ACTIVATION OF INTERCOM AND AN ANNOUNCEMENT TO ALERT ALL PERSONNEL AND VISITORS TO LEAVE THE BUILDING AS SOON AS POSSIBLE AND MEET (FOR A HEAD COUNT) IN THE REAR OF THE PARKING LOT. AN EVACUATION GATHERING AREA IS MARKED ON THE EMERGENCY EVACUATION PLAN DIAGRAM.

TO OPERATE INTERNAL INTERCOM SYSTEM

1. LIFT HANDSET
2. DEPRESS PAGE BUTTON
3. MAKE ANNOUNCEMENT

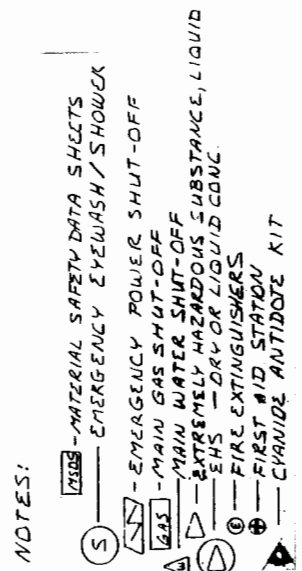
IF THERE WERE ENOUGH TIME TO DESCRIBE THE NATURE OF THE EMERGENCY AND ITS LOCATION, THAT INFORMATION WOULD BE INCLUDED IN THE ANNOUNCEMENT PRIOR TO EVACUATION.

C. PRIMARY EVACUATION ROUTES

THE PRIMARY EVACUATION ROUTES ARE CLEARLY MARKED ON THE EMERGENCY EVACUATION PLAN DIAGRAM LOCATED AT THE END OF THIS SECTION.

D. ALTERNATE EVACUATION ROUTES

ALTERNATE EVACUATION ROUTES ARE MARKED ON A SERIES OF 8 ½ X 11 SIZED DIAGRAMS (A SMALLER VERSION OF THE EMERGENCY EVACUATION PLAN) LOCATED THROUGHOUT THE FACILITY. THESE DIAGRAMS ARE SEALED IN PLASTIC AND ALSO SHOW THE PRIMARY EVACUATION ROUTES. DEPENDING ON WHERE YOU ARE IN THE BUILDING - A CLEAR "**YOUR ARE HERE**" CIRCLE IS HIGHLIGHTED IN A BRIGHT YELLOW COLOR. FROM THIS POINT, PRIMARY EVACUATION ROUTES ARE HIGHLIGHTED IN RED AND THE SECONDARY EVACUATION ROUTES ARE HIGHLIGHTED IN BLUE. A SAMPLE OF THE SHIPPING AND RECEIVING AREA IS INCLUDED.



Emergency Evacuation Plan